

NB:SCF  
F.#2012R00929

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ JUN 28 2012 ★

LONG ISLAND OFFICE

----- X  
UNITED STATES OF AMERICA

**CR-12-0424**  
INDICTMENT

- against -

JAMES J. RICH, JR.,  
also known as "Chip," and  
JAKYMA MAQUIS BUNN,  
also known as "J-Rock,"

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §§ 1951(a)  
and 3551 et seq.; T. 21,  
U.S.C., §§  
841(b)(1)(B)(i),  
841(b)(1)(B)(ii)(II) and  
846)

Defendants.  
----- X

**SPATT, J.**

THE GRAND JURY CHARGES:

COUNT ONE

**BROWN, M. J.**

(Hobbs Act Robbery Conspiracy)

1. On or about and between May 24, 2012 and May 31, 2012, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JAMES J. RICH, JR., also known as "Chip," and JAKYMA MAQUIS BUNN, also known as "J-Rock," together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, to wit: the robbery of a narcotics trafficker in Suffolk County, New York.

(Title 18, United States Code, Sections 1951(a) and 3551  
et seq.)

COUNT TWO

(Conspiracy to Distribute Heroin and Cocaine)

2. On or about and between May 24, 2012, and May 31, 2012, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JAMES J. RICH, JR., also known as "Chip," and JAKYMA MAQUIS BUNN, also known as "J-Rock," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) 100 grams or more of a substance containing heroin, a Schedule I controlled substance, and (b) 500 grams or more of a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846, 841(b)(1)(B)(i) and 841(b)(1)(B)(ii)(II); Title 18, United States Code, Sections 3551 et seq.)

COUNT THREE

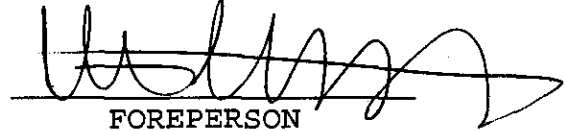
(Attempted Possession of Heroin and Cocaine with Intent to Distribute)

3. On or about May 31, 2012, within the Eastern District of New York and elsewhere, the defendants JAMES J. RICH, JR., also known as "Chip," and JAKYMA MAQUIS BUNN, also known as "J-Rock," together with others, did knowingly and intentionally attempt to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) 100 grams or more of a substance containing heroin, a Schedule I

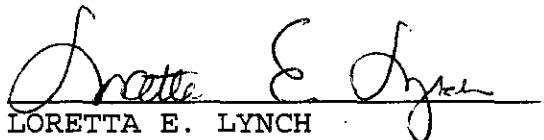
controlled substance, and (b) 500 grams or more of a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846, 841(b)(1)(B)(i) and 841(b)(1)(B)(ii)(II); Title 18, United States Code, Sections 3551 et seq.)

A TRUE BILL



FOREPERSON



LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No.

# UNITED STATES DISTRICT COURT

*EASTERN District of NEW YORK*

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

VS.


*JAMES J. RICH, JR., also known as "Chip," and  
JAKYMA MAQUIS BUNN, also known as "J-Rock,"*

Defendants.

## INDICTMENT

(T. 18, U.S.C., §§ 1951(a) and 3551 et seq.; T. 21, U.S.C. §§ 841(b)(1)(B) (i), 841(b)(1)(B)(ii)(II) and 846)

*A true bill.*



*Foreman*

*Filed in open court this \_\_\_\_\_ day,*

*of \_\_\_\_\_ A.D. 20 \_\_\_\_\_*

*Clerk*

*Bail, \$ \_\_\_\_\_*

*Sean C. Flynn, Assistant U.S. Attorney (631-715-7837)*